

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

CENTER FOR BIOLOGICAL DIVERSITY,  
*et al.*,

Plaintiffs,

v.

TENNESSEE VALLEY AUTHORITY,

Defendant.

No.: 21-cv-00319-TAV-HBG

**ORAL ARGUMENT REQUESTED**

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiffs hereby move for summary judgment. For the reasons fully set forth in the accompanying memorandum and declarations, there are no genuine issues of material fact in dispute, and Plaintiffs are entitled to judgment as a matter of law. In support of this motion, Plaintiffs hereby submit the accompanying Memorandum of Law, along with Plaintiffs' Declarations and Exhibits thereto.

Plaintiffs respectfully request that the Court hear oral argument on Plaintiffs' motion.

DATED: December 13, 2021

Respectfully submitted,

/s/ Rachel L. Wolf

Rachel L. Wolf

BPR 026034

Law Office of Rachel Wolf

706 Walnut Street, Suite 401

Knoxville, TN 37902

(865) 325-9653

[Rlwolf.esq@gmail.com](mailto:Rlwolf.esq@gmail.com)

/s/ Howard M. Crystal

Howard M. Crystal

(D.C. Bar No. 446189)\*

Anchun Jean Su

(D.C. Bar No. CA285167)\*

Center for Biological Diversity

1411 K Street N.W., Suite 1300

Washington, D.C. 20005

(202) 809-6926

[hcrystal@biologicaldiversity.org](mailto:hcrystal@biologicaldiversity.org)

[jsu@biologicaldiversity.org](mailto:jsu@biologicaldiversity.org)

*Admitted pro hac vice*

Counsel for Plaintiffs

### **CERTIFICATE OF SERVICE**

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/s/ Howard M. Crystal  
Howard M. Crystal